

EXHIBIT C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ANGELICA PARKER,

Plaintiff,

v.

TAL ALEXANDER, ALON ALEXANDER
and OREN ALEXANDER,

Defendants.

Case No.: 24 Civ 04813

DECLARATION OF ISABELLE A. KIRSHNER

Pursuant to 28 U.S.C. § 1746(a), ISABELLE A. KIRSHNER declares as follows:

1. I am an attorney with Clayman Rosenberg Kirshner & Linder, LLP, and counsel to Defendants Alon Alexander and Oren Alexander. I make this declaration, based upon my personal knowledge, and join in Defendant Tal Alexander's motion for removal of the civil action, *Parker v. Alexander et al.*, Index No. 155547/2024, (Sup. Ct. N.Y. Co.) (the "State Court Action"), to this Court based on diversity of citizenship.

2. Oren Alexander is a resident of and domiciled in the state of Florida, as stated in the attached Exhibit A, Declaration of Oren Alexander.

3. Alon Alexander is a resident of and domiciled in the state of Florida, as stated in the attached Exhibit B, Declaration of Alon Alexander.

4. On June 18, 2024, Plaintiff Angelica Parker ("Plaintiff") commenced the State Court Action by filing a Summons and Complaint.

5. On June 24, 2024, I emailed Plaintiff's Counsel, Michael Willemin, of Wigdor LLP, and agreed to accept service of the Summons and Complaint.

6. Later that day, Mr. Willemin emailed me the Summons and Complaint and informed me that if Plaintiff were to seek a settlement of this matter, she would seek damages in excess of \$75,000.

7. The jurisdictional predicate is also met pursuant to 28 U.S.C. § 1446(c)(2)(A), because the Complaint seeks nonmonetary relief.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
June 25, 2024

Isabelle A. Kirshner

Isabelle A. Kirshner